

REMARKS

Claims 1-30 were examined and rejected in this case. The Specification is being amended and claims 1, 15, 29 and 30 (i.e. all independent claims) are being amended. No new claims are being added and claims 1-30 remain pending in the application. Reconsideration of the application as amended is respectfully requested.

No new matter is being added. The Specification is amended for reasons of clarity and correction of scriber's errors. The repeated present amendments of (all of) the existing independent claims 1, 15, 29 and 30 are also entered for clarity. Support can further be found at least in the embodiment summarized at page 5, lines 9-19 ("The global server includes a communications engine... security means... an applet which enables I/O with a secured service; and a key safe for storing keys which enable access to the secured services"). See also page 4, line 17 - page 5, line 3 and page 6, lines 4-20.

Claim Rejections under 35 USC §103 - Vogler i.v.o. Netscape version 2

In item 4, the Examiner rejected claims 1-30 under 35 USC §103 as being unpatentable over U.S. Patent No. 5,815,683 to Vogler ("Vogler") in view of Netscape version 2. The Examiner asserts that Vogler teaches a system which controls access to a service for downloading of an access connect applet to a prospective client after authentication. The Examiner admits that Vogler does not teach the use of the key safe that stores a key which enables access to the service, but further asserts the following.

The Examiner asserts Vogler as teaching that the access connect applet may gather authentication information, where "the type and extent of client information collected are application dependent"; thus, it would have been obvious to employ Vogler's access facilitator with home banking systems, Internet shopping, and the like, employing a standard browser such as Netscape on the client side, including a piece of secret information to control access (i.e. a key), and using any or all of the "standard" security techniques used in on-line commerce (sheet 2, paragraph 5). The Examiner further takes Official notice that, while Vogler deals with a single "service", web sites linking to multiple services are ubiquitous and involving only obvious multiplicity to one skilled in the art (sheet 2, paragraph 6). The Examiner further asserts that many systems present different views to users authenticated at different levels of trust or at different

categories of ("client privileges"), such as Lexis/Nexis and ProQuest Direct. Applicant respectfully traverses.

Vogler and Netscape version 2 not only fail to render the present invention *obvious*, but instead support that the present invention, as recited in independent claims 1, 15, 29 and 30 and the remaining dependent claims, is *not* obvious. The combination of these references would not produce or even suggest the present invention, and such references clearly teach away from the present invention both alone and in combination. It is further submitted that the extensive breadth the Examiner attributes to these references is unsupported, conclusory and requires the use of improper hindsight.

Background Information

By way of background, the present invention addresses problems most notably observed with regard to the "roaming user" for whom "maintaining identification and authentication is a cumbersome process". Applicant observed that complex use and tracking of multiple keys can be required and providing a roaming user with direct access to systems behind firewalls can compromise security. (Specification at page 4, line 17 - page 5, line 3). Consider, for example, the cumbersome maintenance and use of private and potentially service-specific information with each of a roaming user's devices, the potential unavailability of such information on a current user device or kiosk, and the compromise of security if such information (assuming it is available) is misappropriated.

Embodiments of the invention therefore include and the claims recite apparatus and methods applicable but not limited to resolving problems associated with a roaming user. An embodiment of a global server enables client I/O with a secured service (page 5, line 24), and enables multiple levels of resource access based on such factors as user status, strength of identification and privacy a communications channel (page 6, lines 17-20). The global server further stores information such as network addresses of services, a user's public and private keys, the user's account numbers and firewall authentication information, such that the user need only maintain the URL of the global server and identification information, such as a password (page 11, lines 16 - page 12, line 4). The global server still further provides three selectable modes with which different levels of

secure access to services are enabled depending, for example, on whether a service is protected by a service firewall. Consistently therewith, claim 1 as amended recites:

“1. A system on a server computer system, comprising:
a communications engine for establishing a communications link with a client;
security services coupled to the communications engine for determining client privileges;
a web server for enabling the client to select a service from a set of available services, the set of available services based on the client privileges;
a host engine coupled to the security services and to the web server for providing to the client service communication code that enables communication with a selected service; and
a key safe for storing keys, each key for enabling communication between the client and a respective service from the set of available services, thereby enabling the client to access the available services without storing the service communication code and keys at the client.

Claim 1

First, Vogler fails to mention, let alone suggest, providing support for a roaming user. It is further submitted that, in contrast with using such user data and user-and-service-specific data as stored bookmarks, calendar data, pager numbers, etc. (see specification at page 17, lines 2-5), the CAD tools to which Vogler is directed would not be readily presumed as relating to a roaming user. We know that Vogler is specifically directed at using CAD tools because such direction and CAD tools are *specified* directly 3 times in the Vogler abstract, directly or indirectly in nearly every paragraph and directly in every independent and nearly every dependent claim (at least 26 times in the claims alone). Vogler further fails completely to mention a single application, let alone considerations of making or using its invention other than with a particular CAD, and the Examiner's assertion that Vogler somehow applies to apparently all Internet applications, if not using impermissible hindsight, is confusing at best.

Second, Vogler fails to mention or suggest the use of a global server or one or more similar apparatus or methods, as recited in claim 1. Vogler is directed only at providing remote access to a CAD application via a *facilitator*.

No ability to select from available services is provided by Vogel, no communication with available “services” is provided according to user privileges, and no communication or access to services is provided in the manner recited in claim 1. Rather, in Vogel, “the access service [i.e. access facilitator] includes services for accepting an access connection... an interworking address... [and an] access request from a client, and routing the access requests... [and] interworking address to a CAD tool on a CAD tool server, resulting in the CAD tool directly responding to the client” (Vogel at col. 1, lines 38-45). Each successive client action involving the CAD tool is also similarly *facilitated* by the facilitator, which passes the selection to the CAD tool, and the CAD tool again (in each successful client-facilitator instance), uses the client interworking address to “respond” to the client action (col. 3, lines 1-17). Such lack of “communication” and “client access” is further essential to Vogler in that monitored client-facilitator client requests and separate tool server initiated connection to the supplied client address purportedly ensures CAD *design data* integrity (col. 3, lines 43-52 and col. 5, lines 57-59).

Note also that Vogler would also be contrary to providing a secure client-service connection due to its essential use of two separate data transfer paths. Note further that the Vogel facilitated system would be contrary to providing the available services as in claim 1, since each communication would require establishing each of the processes and two data paths with each successive client-facilitator access request.

Third, Vogel neither mentions nor suggests providing a client with service communication code that enables communication with a selected service, as recited in claim 1. The Vogel client requests are monitored by a facilitator monitor and -assuming the facilitator can and does respond to the particular client request- the facilitator sends that request with the client address to the tool server; the tool server then sends a “response” directly to the client address provided by the client via the facilitator.

Fourth, neither Vogel nor Netscape provides a key safe or other suitable extra-client key providing mechanism, and neither enables the client to access available services without storing the service communication code and keys at the client as is recited in claim 1. Rather, in Vogel, an access request applet prompts

the client for client information (col. 4, lines 47-48) and submits the access information to an access "service" [i.e. a program] in the facilitator (col. 4, lines 59-60).

With regard to keys in particular, Vogel specifically notes the use of [Netscape] navigator version 3 or later at col. 4, line 18, and Netscape navigator was specifically cited by the Examiner. As the Examiner asserts (and as is common knowledge), Netscape Navigator resides on an Internet client and provides for storing *at the client*, public and private keys used in authentication. Thus, both Vogel and Netscape Navigator are in direct contradiction to claim 1 as recited. Rather, claim 1 specifically enables keys to NOT be stored at the client.

The Examiner has further noted that Vogel at col. 3 lines 35-36 states that the "type and extent of client information collected are application dependent" (item 4, first paragraph). Firstly, Vogel provides not one example, one consideration or any basis by which such information might be utilized in making or using its invention. Secondly, if the Examiner's assertion is to be given effect, then any use of any data by a server is rendered obvious in his view. This could have a disastrous chilling effect on further innovation, is wholly unsupported and conclusory, would not support a Vogel claim to such effect and is contrary to the very purpose of patent protection.

The Examiner also takes Official notice that web sites linking to multiple sites are ubiquitous. However, it is submitted that claim 1 enables a new and unobvious system that enables multiple services to be provided that was clearly not anticipated by the manner in which Vogel enabled one. Claim 1 further is capable of supporting each of the three communication modes between a client and a service that are more particularly taught in accordance with more specific embodiments of the invention: direct connection; proxy and global server provided service (or some combination). Impermissible hindsight aside, Vogel fails to teach even one of the three modes and further teaches a method that is contrary to and might render each one inoperable (either alone or in combination with Netscape Navigator); any combination with either reference would further fail to render claim 1 obvious for similar reasons.

Therefore, reconsideration of the rejection to claim 1, removal of Vogel and Netscape Navigator from future consideration and early allowance of claim 1 is respectfully requested.

The Remaining Claims

Each of the remaining independent claims (claims 15, 29 and 30) include similar limitations as have already been discussed with regard to claim 1. Further, the remaining claims 2-14 and 16-28 are dependent claims subject to the same limitations as the respective independent claims. Therefore, reconsideration of the rejection of claims 2-30 and early allowance of claims 2-30 is respectfully requested for at least the same reasons as with claim 1.

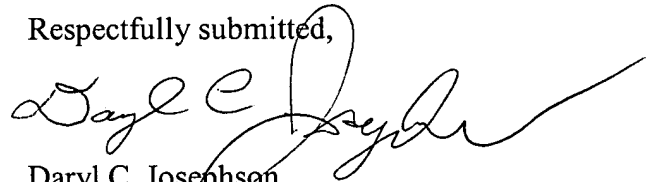
Therefore, reconsideration of the rejections and early allowance of claims 1-30 is solicited.

If the Examiner has any questions or needs any additional information, the Examiner is invited to telephone the undersigned attorney at (650) 843-8796. If for any reason an insufficient fee has been paid, please charge the insufficiency to Deposit Account No. 05-0150.

Date: 10/31/00

Squire, Sanders & Dempsey L.L.P.
600 Hansen Way
Palo Alto, CA 94304-1043
Telephone (650) 856-6500
Facsimile (650) 856-3619

Respectfully submitted,



Daryl C. Josephson
Attorney for Applicant
Registration No. 37,365